IN RE: STEVEN ALLEN ALTLAND, AND JENNIFER RUTH ALTLAND, Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS CHAPTER 13 TRUSTEE Movant

CASE NO: 1-24-01929-HWV

VS.

STEVEN ALLEN ALTLAND, AND JENNIFER RUTH ALTLAND, Respondent(s)

## TRUSTEE'S MOTION TO DISMISS CASE

AND NOW, on June 2, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney Douglas R. Roeder, Esquire, and respectfully represents the following:

- 1. A Plan was filed on August 27, 2024.
- 2. A hearing was held, and an Order was entered on March 5, 2025, directing that an amended plan be filed within sixty (60) days.
- 3. As of the date of this Motion, an amended plan has not been filed.
- 4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire Id: 80016
Attorney for Movant
Jack N. Zaharopoulos
Standing Chapter 13 Trustee
Suite A, 8125 Adams Drive
Hummelstown, PA 17036

Phone: 717-566-6097

email: droeder@pamd13trustee.com

IN RE: STEVEN ALLEN ALTLAND, AND JENNIFER RUTH ALTLAND,

Debtor(s) CHAPTER 13

JACK N. ZAHAROPOULOS CHAPTER 13 TRUSTEE Movant

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## **NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Sylvia H. Rambo United States Courthouse Date: June 25, 2025

Bankruptcy Courtroom 4B

1501 North 6th Street Time: 9:35 AM

Harrisburg, PA 17102

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: June 2, 2025

/s/ Douglas R. Roeder, Esquire

Id: 80016

Attorney for Movant Jack N. Zaharopoulos Standing Chapter 13 Trustee

Standing Chapter 13 Trustee Suite A, 8125 Adams Drive Hummelstown, PA 17036

Phone: 717-566-6097

email: droeder@pamd13trustee.com

IN RE: STEVEN ALLEN ALTLAND,

AND JENNIFER RUTH ALTLAND,

Debtor(s) **CHAPTER 13** 

JACK N. ZAHAROPOULOS

CHAPTER 13 TRUSTEE CASE NO: 1-24-01929-HWV

Movant

VS.

STEVEN ALLEN ALTLAND, AND JENNIFER RUTH ALTLAND, Respondent(s)

# **CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on June 2, 2025, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

#### Served electronically

E. HALEY ROHRBAUGH, ESQUIRE UNITED STATES TRUSTEE CGA LAW FIRM, P.C. 1501 NORTH 6TH STREET 135 NORTH GEORGE STREET BOX 302 YORK, PA 17401 HARRISBURG, PA 17102

Served by 1st Class Mail STEVEN ALLEN ALTLAND JENNIFER RUTH ALTLAND 1255 CONEWAGO AVENUE MANCHESTER, PA 17345

I certify under penalty of perjury that the foregoing is true and correct.

Date: June 2, 2025 /s/ Matthew Harnsberger

Office of Standing Chapter 13 Trustee

Jack N. Zaharopoulos Suite A, 8125 Adams Dr. Hummelstown, PA 17036 Phone: 717 566-6097

email: info@pamd13trustee.com

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Debtor(s) CHAPTER 13

JACK N. ZAHAROPOULOS CHAPTER 13 TRUSTEE

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Movant

## **ORDER DISMSSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.